REMARKS

Claims 1-8, 11-13, 17-29, 32 and 33 are pending in the application.

Claims 1-8, 11-13, 17-29, 32 and 33 have been rejected.

Claims 1-6, 8, 11, 13, 17-19 and 22-26 have been amended.

Claims 7, 12, 27-29 and 32-33 have been cancelled.

Rejection of Claims Under 35 U.S.C. §112

Claims 1, 3, 6-8, 11-13, 17, 19, 22, 24, 27-29, 32 and 33 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully traverse this rejection.

The above-cited claims stand rejected because the previously amended claim elements related to "input data including a hierarchy of instances of object components," "higher-level component instance," "lower-level component instance," "input data including an external hierarchy of instances of object components," "local group of instances," "local group," "local instance," "higher-level instances," "external hierarchy," "updating the local instance," "set of child local instance," "first set of lower-level instances within the external hierarchy," "the external instances in the first set having matching child local instance," "inserting new local instances into the local group based on a second set of lower-level external instances," and "the external instances in the second set not having matching local instances in the set of child local instances" purportedly do not have support in the Application as filed. *See* Office Action, pp. 3-5. Without conceding to the discussion within the Office Action as to the above-listed claim elements, but instead to advance prosecution, Applicants have amended the above-cited

claims. Support for the listed amendments can be found at least at paragraphs 24, 26 and 31 and Figures 4A and 5 of the Application. Applicants respectfully submit that these amendments address the 35 U.S.C. § 112 rejections in the Office Action.

Rejection of Claims Under 35 U.S.C. §102

Claims 1-4, 6-8, 11-13, 17-20, 22-25 and 27-29 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent 6,591,272 issued to Williams ("Williams"). Applicants respectfully traverse this rejection.

Independent Claims 1, 6, 11, 17 and 22, as amended, each contain claim limitations of substantially the following form:

> receiving input data comprising a plurality of integration objects, wherein
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> the plurality of integration objects are hierarchically related,
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> each of the plurality of integration objects comprises information,
>
> the plurality of integration objects comprises a first and second integration object, and
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> the second integration object is a child object of the first integration object.

Claim 1 (as amended). Applicants respectfully submit that the cited sections of Williams fail to provide disclosure of these claim limitations. The section of Williams cited against the original "receiving input data" limitation, provides purported description of SQL and its syntax. *See* Office Action, pp.6-7 (citing Williams 2:48-53). This section does not describe the input data of the amended claims, which is a plurality of integration objects in a hierarchy. As claimed, and as described in the present Application, the integration objects are not database data, but are instead data that is compared to database data and used to modify database data. *See, e.g.*, Application, ¶¶ [24], [26] and Fig. 1.

Claims 1, 6, 11, 17 and 22, as amended, each further contain claim limitations of substantially the following form: "comparing a first database record with the first integration object." *See* Claim 1 (as amended). The cited sections of Williams fail to provide disclosure of this limitation. As an initial matter, as indicated above, Williams does not disclose integration objects and, therefore, cannot disclose comparing the claimed first integration object with a first database record.

The Office Action cites to a section of Williams that purportedly discusses "the process of interrogation of relational database schema or catalogs" (Office Action, p.7), but this is not disclosure of the claimed "finding a first database record by comparing the first integration object with the first database record." Mere interrogation of a relational database does not provide for matching of data within the relational database and information found within an integration object (which itself is not disclosed in the cited sections of Williams), nor does mere interrogation provide for the claimed "comparing."

The Office Action also cites to a section of Williams related to using software "to map objects from relations and data in relational database management systems or vice versa to object oriented applications." Office Action, p.7 (citing Williams 3:3-5). Applicants respectfully submit that the disclosed purported "map" does not provide "comparing" and matching, as claimed, and in fact, Williams provides little to no details regarding this "map," which is, at best, ancillary to the overall disclosure of Williams.

Claims 1, 6, 11, 17 and 22, as amended, each also contain claim limitations of substantially the following form:

- finding one or more child database records associated with the first database record, and
- modifying one or more of the child database records using the information associated with the second integration object, if the

> second integration object comprises a record matching a corresponding record in the one of the one or more child database records.

Claim 1 (as amended). Applicants respectfully submit that the cited sections of Williams do not provide disclosure of these claim limitations. As an initial matter, as stated above, Williams does not provide disclosure of input data comprising integration objects that are hierarchically related to one another, as claimed. Without such an input data hierarchy, there can be no disclosure of the claimed "second integration object" which "is a child object of the first integration object." Therefore, Williams cannot provide disclosure of modifying a child database record with information associated with the second integration object.

In addition, the cited sections of Williams do not provide disclosure of matching records from a child input data record to a child of the database record. The first cited section of Williams merely provides purported disclosure of using "software to map objects from relations and data in relational database management systems or vice versa to object oriented applications." *See* Office Action, pp.7-8 (citing Williams 3:3-5). This section provides no disclosure of the claimed matching, modifying or finding. The second cited section discusses the purported purpose of the mechanism provided in Williams, but does not provide any disclosure of finding or matching, as claimed. *See* Williams 5:34-38 ("The present invention also relates to a method of communication of changes to existing objects from client computers and their conversion into updates to one or more rows so as to modify the rows of the appropriate tables in the corresponding databases in transactional mode.").

Finally, Claims 1, 6, 11, 17 and 22, as amended, each further contain claim limitations of substantially the following form:

> inserting a new database record comprising the information associated with the second integration object, if the second integration object does not comprise a record matching a corresponding record in one of the one or more child database records, wherein
>
> > the one or more child database records comprises the new database record.

Claim 1 (as amended). The cited sections of Williams fail to provide disclosure of these claim limitations. The cited sections provide disclosure of purportedly inserting a object using "OSFORBStream" and "OSFGenerate" routines, but neither the cited sections nor the Office Action provide any indication of how elements of these passages relate to any of the previously discussed purportedly corresponding elements. *See, e.g.*, Office Action, p.8 (citing Williams 14:2-4, 25:57-61). Further, neither of these sections provide disclosure of attempting a matching and then performing inserting a new database record in response to failing to match. *See also, e.g.*, Williams 8:49-9:15 (describing a method purportedly using the OSFORBStream module to transmit information over a network with reduced network requests).

For at least these reasons, Applicants submit that Williams fails to provide disclosure of all limitations of independent Claims 1, 6, 11, 17 and 22, as amended, and all claims depending therefrom (Claims 2-5, 8, 13, 18-21, and 23-26) and that these claims are in condition for allowance. Therefore, Applicants respectfully request the Examiner's reconsideration and withdrawal of the rejections as to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop RCE, COMMISSIONER FOR PATENTS, P. O. Box 1450, Alexandria, VA 22313-1450, on October 16, 2006.

Attorney for Applicant(s) — Date of Signature: 10/16/2006

Respectfully submitted,

Jonathan N. Geld
Attorney for Applicants
Reg. No. 44,702
(512) 439-5090 [Phone]
(512) 439-5099 [Fax]